

Exhibit 1



**Oxley Rich
Sammons**
— LAW FIRM —

September 17, 2019

Kristina Thomas Whiteaker
David L. Grubb
The Grubb Law Group
1114 Kanawha Boulevard, East
Charleston, WV 25301

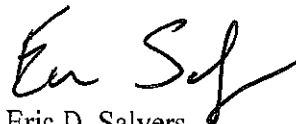
Re: Rebecca Klug v. Marshall University, et al.
USDC for the Southern District of West Virginia, Huntington Division; 3:18-cv-00711
Claim No.: 501-566796

Dear Kris:

Enclosed please find *Defendant Marshall University Board of Governors' Second Supplemental Responses to Plaintiff's First Set of Interrogatories and Request for Production of Documents*. The Certificate of Service was electronically filed today.

As always, if you have any questions or concerns, please feel free to contact our office.

Sincerely,


Eric D. Salyers

EDS/ddw
Enclosures

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

HUNTINGTON DIVISION

REBECCA KLUG,

Plaintiff,

v.

**Civil Action No.: 3:18-CV-00711
Judge Robert C. Chambers**

**MARSHALL UNIVERSITY
BOARD OF GOVERNORS,
and FARID B. MOZAFFARI, an individual,**

Defendants.

**DEFENDANT MARSHALL UNIVERSITY BOARD OF GOVERNORS'
SECOND SUPPLEMNATAL RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant, Marshall University Board of Governors ("Marshall University"), by counsel, Perry W. Oxley, David E. Rich, Eric D. Salyers, and the law firm of Oxley Rich Sammons, hereby submit the following Defendant Marshall University Board of Governors' Second Supplemental Responses to Plaintiffs' First Set of Interrogatories and Request for Production of Documents, pursuant to the Federal Rules of Civil Procedure.

RESPONSES TO INTERROGATORIES

7. Please identify, by name, address, telephone number, and gender, all individuals who have been demoted or terminated from the residency program at Marshall University School of Medicine from January 1, 2013 to the present. For each such individual, please also provide the reason each such individual was demoted or terminated from the residency program.

ORIGINAL ANSWER: Objection. The Defendant objects on the basis that disclosure of the

information sought by this Interrogatory violates the Family Educational Rights and Privacy Act of 1974. Without releases or authorizations from any and all individuals that may be revealed in information requested by this Interrogatory, the Defendant is not permitted to provide said information. The Defendant further objects to this Interrogatory because it seeks information beyond the scope of permissible discovery and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendant further objects to this Interrogatory because it is overly broad and unduly burdensome.

SUPPLEMENTAL ANSWER: Pursuant to this Court's Order [ECF 47], below is a table with an anonymous list of the individuals in the surgery residency program from January 1, 2013 to December 31, 2016, along with whether or not the resident was demoted and/or terminated and the reason for demotion/termination. This list does not include the Plaintiff.

Resident Number	Gender	DEMOTED/TERMINATED	REASON
1	Male	NO	N/A
2	Male	NO	N/A
3	Female	NO	N/A
4	Female	NO	N/A
5	Male	NO	N/A
6	Male	NO	N/A
7	Male	NO	N/A
8	Female	NO	N/A
9	Male	NO	N/A
10	Male	NO	N/A

11	Female	NO	N/A
12	Male	NO	N/A
13	Male	NO	N/A
14	Male	NO	N/A
15	Male	NO	N/A
16	Male	NO	N/A
17	Male	NO	N/A
18	Male	NO	N/A
19	Male	NO	N/A
20	Male	NO	N/A
21	Female	NO	N/A
22	Male	NO	N/A
23	Male	NO	N/A
24	Male	NO	N/A
25	Female	NO	N/A
26	Male	NO	N/A
27	Male	NO	N/A
28	Male	NO	N/A
29	Male	NO	N/A
30	Female	NO	N/A
31	Male	NO	N/A

32	Male	CONTRACT NOT RENEWED	Failed to meet Criteria for Promotion
33	Female	NO	N/A
34	Male	NO	N/A
35	Male	NO	N/A
36	Female	NO	N/A
37	Male	NO	N/A
38	Male	NO	N/A
39	Male	NO	N/A
40	Male	NO	N/A
41	Male	NO	N/A
42	Female	NO	N/A

8. Please provide a list of all persons in the surgical residency program for Defendant from 2013 to present. For each person, please provide the person's gender and all ABS In-Training (ABSITE) scores.

ORIGINAL ANSWER: Objection. The Defendant objects on the basis that disclosure of the information sought by this Interrogatory violates the Family Educational Rights and Privacy Act of 1974. Without releases or authorizations from any and all individuals that may be revealed in information requested by this Interrogatory, the Defendant is not permitted to provide said information. The Defendant further objects to this Interrogatory because it seeks information beyond the scope of permissible discovery and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendant further objects to this Interrogatory because it is overly

broad and unduly burdensome.

SUPPLEMENTAL ANSWER: Pursuant to this Court's Order [ECF 47], below is a table with an anonymous list of the individuals in the surgery residency program for the time period requested, along with their ABSITE scores. This list does not include the Plaintiff. Also, the residents took a different level ABSITE exam depending on their PGY level.

Resident Number	2013 ABSITE Score	2014 ABSITE Score	2015 ABSITE Score	2016 ABSITE Score
1	Standard Score=516; Percentile=49; Percentage Correct=76%	Standard Score=554; Percentile=34; Percentage Correct=74%	N/A	N/A
2	Standard Score=543; Percentile=47; Percentage Correct=77%	Standard Score=495; Percentile=25; Percentage Correct=69%	Standard Score=547; Percentile=32; Percentage Correct=74%	Standard Score=516; Percentile=13; Percentage Correct=72%
3	N/A	N/A	N/A	N/A
4	N/A	N/A	N/A	N/A
5	N/A	Standard Score=254; Percentile=7; Percentage Correct=49%	Standard Score=497; Percentile=50; Percentage Correct=70%	Standard Score=543; Percentile=47; Percentage Correct=77%
6	Standard Score=427; Percentile=29; Percentage Correct=66%	Standard Score=347; Percentile=4; Percentage Correct=57%	Standard Score=512; Percentile=26; Percentage Correct=71%	Standard Score=541; Percentile=27; Percentage Correct=74%
7	N/A	N/A	N/A	Standard Score=421; Percentile=56; Percentage Correct=64%
8	Standard Score=397; Percentile=20;	Standard Score=416; Percentile=14;	Standard Score=492; Percentile=14;	Standard Score=541; Percentile=27;

	Percentage Correct=63%	Percentage Correct=63%	Percentage Correct=69%	Percentage Correct=74%
9	N/A	Standard Score=490; Percentile=15; Percentage Correct=69%	Standard Score=437; Percentile=1; Percentage Correct=65%	N/A
10	N/A	N/A	N/A	Standard Score=275; Percentile=9; Percentage Correct=51%
11	N/A	N/A	N/A	Standard Score=265; Percentile=7; Percentage Correct=50%
12	Standard Score=458; Percentile=40; Percentage Correct=69%	N/A	N/A	N/A
13	N/A	N/A	N/A	Standard Score=645; Percentile=24; Percentage Correct=57%
14	N/A	N/A	N/A	N/A
15	Standard Score=268; Percentile=3; Percentage Correct=61%	Standard Score=332; Percentile=0; Percentage Correct=55%	Standard Score=432; Percentile=1; Percentage Correct=64%	Standard Score=446; Percentile=1; Percentage Correct=66%
16	N/A	Standard Score=421; Percentile=57; Percentage Correct=63%	Standard Score=497; Percentile=50; Percentage Correct=75%	Standard Score=581; Percentile=71; Percentage Correct=78%
17	N/A	N/A	Standard Score=413; Percentile=51; Percentage Correct=63%	Standard Score=531; Percentile=89; Percentage Correct=73%

18	N/A	Standard Score=436; Percentile=18; Percentage Correct=64%	Standard Score=487; Percentile=14; Percentage Correct=69%	Standard Score=511; Percentile=15; Percentage Correct=72%
19	N/A	Standard Score=219; Percentile=3; Percentage Correct=46%	N/A	N/A
20	Standard Score=557; Percentile=56; Percentage Correct=78%	N/A	N/A	N/A
21	Standard Score=372; Percentile=4; Percentage Correct=61%	Standard Score=406; Percentile=3; Percentage Correct=62%	Standard Score=502; Percentile=11; Percentage Correct=70%	Standard Score=531; Percentile=18; Percentage Correct=73%
22	Standard Score=458; Percentile=17; Percentage Correct=72%	N/A	N/A	N/A
23	N/A	N/A	Standard Score=213; Percentile=3; Percentage Correct=46%	N/A
24	N/A	Standard Score=465; Percentile=16; Percentage Correct=67%	Standard Score=557; Percentile=41; Percentage Correct=75%	Standard Score=586; Percentile=55; Percentage Correct=78%
25	N/A	N/A	N/A	Standard Score=446; Percentile=65; Percentage Correct=66%
26	N/A	N/A	N/A	Standard Score=536; Percentile=93; Percentage Correct=74%

27	Standard Score=377; Percentile=17; Percentage Correct=62%	N/A	N/A	N/A
28	N/A	N/A	N/A	N/A
29	N/A	N/A	N/A	N/A
30	Standard Score=277; Percentile=7; Percentage Correct=52%	N/A	N/A	N/A
31	N/A	N/A	Standard Score=398; Percentile=45; Percentage Correct=62%	Standard Score=416; Percentile=12; Percentage Correct=63%
32	N/A	N/A	N/A	N/A
33	N/A	Standard Score=249; Percentile=6; Percentage Correct=48%	Standard Score=432; Percentile=17; Percentage Correct=64%	Standard Score=481; Percentile=13; Percentage Correct=69%
34	N/A	N/A	Standard Score=592; Percentile=98; Percentage Correct=78%	Standard Score=601; Percentile=92; Percentage Correct=80%
35	N/A	N/A	Standard Score=482; Percentile=79; Percentage Correct=69%	Standard Score=471; Percentile=33; Percentage Correct=68%
36	Standard Score=458; Percentile=22; Percentage Correct=72%	Standard Score=510; Percentile=12; Percentage Correct=70%	Standard Score=482; Percentile=79; Percentage Correct=69%	Standard Score=471; Percentile=33; Percentage Correct=68%
37	N/A	N/A	Standard Score=532; Percentile=92;	Standard Score=536; Percentile=43;

			Percentage Correct=73%	Percentage Correct=74%
38	N/A	N/A	Standard Score=313; Percentile=16; Percentage Correct=55%	N/A
39	N/A	N/A	N/A	N/A
40	Standard Score=252; Percentile=1; Percentage Correct=60%	Standard Score=431; Percentile=2; Percentage Correct=64%	N/A	N/A
41	Standard Score=632; Percentile=94; Percentage Correct=83%	Standard Score=647; Percentile=93; Percentage Correct=82%	Standard Score=592; Percentile=59; Percentage Correct=78%	N/A
42	N/A	Standard Score=205; Percentile=2; Percentage Correct=45%	N/A	N/A

REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

8. Please produce the complete contents of Defendant Farid Mozaffari's personnel file and all similar files. By the phrase "personnel file and all similar files," Plaintiff means all documents kept by BOG that refer to Defendant Mozaffari, including but not limited to all personnel records, discipline records, and all other documents kept by BOG that are used, have been used, or could have been used relative to Defendant Mozaffari's qualifications for employment, promotion, transfer, additional compensation, increase or decrease in grade level, disciplinary action, training, qualifications, applications, performance reviews, as well as any and all internal and confidential documents referring in any manner to Defendant Mozaffari.

ORIGINAL RESPONSE: Objection. The Defendant objects to this Request because it seeks

information beyond the scope of permissible discovery and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendant further objects to this Request because it is overly broad and unduly burdensome. Dr. Mozaffari's personnel file in no way provides any relevant information related to the Plaintiff's allegations.

SUPPLEMENTAL RESPONSE: Pursuant to this Court's Order [ECF 47], the Defendant does not have any records in its control or possession concerning complaints and/or disciplinary actions against Dr. Mozaffari, which contain allegations of (1) sexual harassment; (2) sex discrimination; (3) disability discrimination; and/or (4) retaliation for sexual harassment, sex discrimination, or disability discrimination complaints. Moreover, the Defendant has not found any documentation concerning training on the four topics above. Likewise, the Defendant has not found any performance evaluations of Dr. Mozaffari.

9. If any of Defendant Mozaffari's supervisors (or other of Defendant's employees) kept a personnel file, medical file, or similar file (as defined, supra), or kept an "unofficial" file with information regarding Defendant Mozaffari, please: (a) identify who kept such file; (b) make available for inspection the original of such file; and (c) produce a copy of all documents contained in each such file (including a copy of the document container or file folder).]

ORIGINAL RESPONSE: Objection. The Defendant objects to this Request because it seeks information beyond the scope of permissible discovery and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendant further objects to this Request because it is overly broad and unduly burdensome. Dr. Mozaffari's personnel file in no way provides any relevant information related to the Plaintiff's allegations.

SUPPLEMENTAL RESPONSE: Pursuant to this Court's Order [ECF 47], the Defendant

does not have any documents responsive to this request.

10. Please produce the complete contents of the personnel files and all similar files for all Surgical Residents for the years 2013 to 2016. By the phrase “personnel file and all similar files,” Plaintiff means all documents kept by BOG that refer to the Surgical Residents, including but not limited to all personnel records, discipline records, and all other documents kept by BOG that are used, have been used, or could have been used relative to the Surgical Residents’ qualifications for employment, promotion, transfer, additional compensation, increase or decrease in grade level, disciplinary action, training, qualifications, applications, performance reviews, as well as any and all internal and confidential documents referring in any manner to the Surgical Residents for the years 2013 to 2016.

ORIGINAL RESPONSE: Objection. The Defendant objects on the basis that disclosure of the documents sought by this Request violates the Family Educational Rights and Privacy Act of 1974. Without releases or authorizations from any and all individuals that may be revealed in documents requested by this Request, the Defendant is not permitted to release said information. The Defendant further objects to this Request because it seeks information beyond the scope of permissible discovery and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendant further objects to this Request because it is overly broad and unduly burdensome.

SUPPLEMENTAL RESPONSE: Pursuant to this Court’s Order [ECF 47], please see Plaintiff’s complaint against Dr. Yung, attached hereto as Exhibit A (upon information and belief, these documents have already been produced). No other complaints against Dr. Yung exist. Additionally, the Defendant does not have any complaints against Dr. Uffort. With

respect to evaluations, please see the evaluation of Dr. Yung, attached hereto as Exhibit B, and the evaluation of Dr. Uffort, attached hereto as Exhibit C. These documents are marked confidential and are being produced pursuant to the Protective Order in this case.

11. If any of the Surgical Residents' supervisors (or other of Defendant's employees) kept a personnel file, medical file, or similar file (as defined, supra), or kept an "unofficial" file with information regarding the Surgical Residents, please: (a) identify who kept such file; (b) make available for inspection the original of such file; and (c) produce a copy of all documents contained in each such file (including a copy of the document container or file folder).

ORIGINAL RESPONSE: Objection. The Defendant objects on the basis that disclosure of the documents sought by this Request violates the Family Educational Rights and Privacy Act of 1974. Without releases or authorizations from any and all individuals that may be revealed in documents requested by this Request, the Defendant is not permitted to release said information. The Defendant further objects to this Request because it seeks information beyond the scope of permissible discovery and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendant further objects to this Request because it is overly broad and unduly burdensome.

SUPPLEMENTAL RESPONSE: Pursuant to this Court's Order [ECF 47], the Defendant does not have any documents responsive to this request.

14. Please produce copies of any additional personnel policies, guidelines, memoranda, or similar documents dealing specifically with the subjects of workplace discrimination, sex discrimination, disability discrimination, and/or Title IX.

ORIGINAL RESPONSE: See attached Exhibit D.

SUPPLEMENTAL RESPONSE: Pursuant to this Court's Order [ECF 47], please see attached Exhibit D.

**MARSHALL UNIVERSITY BOARD OF
GOVERNORS,**

By Counsel,

s/Eric D. Salyers

Perry W. Oxley (WVSB #7211)

David E. Rich (WVSB #9141)

Eric D. Salyers (WVSB #13042)

Oxley Rich Sammons

517 9th Street, Suite 1000

Huntington WV 25701

304-522-1138

304-522-9528 (fax)

poxley@oxleylawwv.com

drich@oxleylawwv.com

esalyers@oxleylawwv.com

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

HUNTINGTON DIVISION

REBECCA KLUG,

Plaintiff,

v.

Civil Action No.: 3:18-CV-00711
Judge Robert C. Chambers

MARSHALL UNIVERSITY
BOARD OF GOVERNORS,
and FARID B. MOZAFFARI, an individual,

Defendants.

CERTIFICATE OF SERVICE

The undersigned counsel for Defendant, Marshall University Board of Governors, served the foregoing *“Defendant Marshall University Board of Governors’ Second Supplemental Responses to Plaintiff’s First Set of Interrogatories and Request for Production of Documents”* by electronically filing a true copy of the same with the Clerk of the Court using the CM/ECF system on this 17th day of September, 2019.

Kristina Thomas Whiteaker
David L. Grubb
The Grubb Law Group
1114 Kanawha Boulevard, East
Charleston, WV 25301
Counsel for Plaintiff, Rebecca Klug

s/Eric D. Salyers

Perry W. Oxley (WVSB #7211)
David E. Rich (WVSB #9141)
Eric D. Salyers (WVSB # 13042)

Exhibit 2

April Romaca White

From: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Sent: Friday, December 06, 2019 1:34 PM
To: April White
Subject: FW: Klug

Kristina Thomas Whiteaker
The Grubb Law Group, PLLC
1114 Kanawha Boulevard East
Charleston, WV 25301
304-345-3356

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From: Kristina Thomas Whiteaker [mailto:KWhiteaker@grubblawgroup.com]
Sent: Wednesday, September 11, 2019 2:24 PM
To: 'Eric D. Salyers' <esalyers@oxleylawwv.com>
Cc: April White (awhite@grubblawgroup.com) <awhite@grubblawgroup.com>
Subject: RE: Klug

Ok. Let's plan on 2:00. I will call you.
Thanks!
Kris

From: Eric D. Salyers [mailto:esalyers@oxleylawwv.com]
Sent: Wednesday, September 11, 2019 2:23 PM
To: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Subject: Re: Klug

I'll be driving back from Columbus Ohio tomorrow morning from about 8-11. I'd be happy to talk to you in that time frame outside of a 10 am phone call I have scheduled in another matter.

Otherwise, I could speak with you tomorrow afternoon around 2 or 3.

Let me know what works for you.

Eric D. Salyers, Esq.
Oxley Rich Sammons

From: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Sent: Wednesday, September 11, 2019 2:19:43 PM
To: Eric D. Salyers <esalyers@oxleylawwv.com>
Subject: Klug

Dear Eric,
Do you have time tomorrow for a call following up our meeting last week?
Thanks,
Kris

Kristina Thomas Whiteaker
The Grubb Law Group
1114 Kanawha Boulevard East
Charleston, WV 25301
304-345-3356

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Exhibit 3

April Romaca White

From: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Sent: Friday, December 06, 2019 1:33 PM
To: April White
Subject: FW: Klug

Kristina Thomas Whiteaker
The Grubb Law Group, PLLC
1114 Kanawha Boulevard East
Charleston, WV 25301
304-345-3356

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From: Eric D. Salyers [mailto:esalyers@oxleylawwv.com]
Sent: Wednesday, October 30, 2019 4:24 PM
To: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Subject: RE: Klug

Sounds good, speak to you then.

Eric D. Salyers, Esq.
Oxley Rich Sammons

From: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Sent: Wednesday, October 30, 2019 4:23 PM
To: Eric D. Salyers <esalyers@oxleylawwv.com>
Subject: RE: Klug

Great. I'm going to shoot for about 10:00 tomorrow morning.
Thanks!

Kristina Thomas Whiteaker
The Grubb Law Group, PLLC
1114 Kanawha Boulevard East

Charleston, WV 25301
304-345-3356

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From: Eric D. Salyers [mailto:esalyers@oxleylawwv.com]
Sent: Wednesday, October 30, 2019 4:20 PM
To: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Subject: RE: Klug

I should be available most of the day tomorrow. Feel free to call anytime.

Eric D. Salyers, Esq.
Oxley Rich Sammons

From: Kristina Thomas Whiteaker <KWhiteaker@grubblawgroup.com>
Sent: Wednesday, October 30, 2019 4:14 PM
To: Eric D. Salyers <esalyers@oxleylawwv.com>
Subject: Klug

Eric,
Do you have time to talk tomorrow about discovery in this case? I feel like there are several outstanding issues from our prior meeting that we need to discuss, and I would also like to talk about depositions.
I am available just about anytime tomorrow. Let me know what time would work for you.

Thanks,
Kris

Kristina Thomas Whiteaker
The Grubb Law Group, PLLC
1114 Kanawha Boulevard East
Charleston, WV 25301
304-345-3356

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Exhibit 4

THE GRUBB LAW GROUP, PLLC

ATTORNEYS AT LAW
1114 KANAWHA BOULEVARD, EAST
CHARLESTON, WEST VIRGINIA 25301

KRISTINA THOMAS WHITEAKER
DAVID L. GRUBB

APRIL ROMACA WHITE, PARALEGAL
AMANDA McMILLEN, LEGAL ASSISTANT

TELEPHONE 304-345-3356
FACSIMILE 304-345-3355

WWW.GRUBBLAWGROUP.COM
KWHITEAKER@GRUBBLAWGROUP.COM

Eric D. Salyers, Esquire
Oxley Rich Sammons
Post Office Box 1704
Huntington, WV 25718

November 12, 2019
VIA FACSIMILE & U. S. MAIL

Re: *Rebecca Klug v. Marshall University Board of Governors and Farid B. Mozaffari*
Civil Action No. 3:18-cv-00711 (Judge Chambers)

Dear Eric:

I am writing to request deposition dates again for your client's 30(b) deposition. As you know, I filed the 30(b) Notice with the Court on September 18, 2019. I would also like to take the depositions of Dr. Rebecca Wolfer, Dr. Jillian McCagg, and Defendant Mozaffari.

I am available on November 15, 25, and 26, 2019. I can take the depositions of Dr. Wolfer and Dr. McCagg in the same day. I will need one day for the 30(b) deposition and one day for Defendant Mozaffari's deposition. I will hold the three proposed dates on my calendar. I am concerned that we will need to push back the expert deadlines again given the difficulty in scheduling the 30(b) deposition. Also, I understand that Defendant Mozaffari now lives out of state. If so, I will conduct his deposition via video conferencing. Please provide an address so we can make arrangements.

Also, it appears that your client has not complied with Judge Eifert's Order of September 4, 2019. By the Judge's Order, we met on September 6, 2019 in your office, and conferred again by telephone on September 12, 2019 and October 31, 2019, regarding Request for Production Numbers 21, 22, 24, 25, 27, and 28. When we conferred on the foregoing requests, we agreed to narrow several of the requests and you indicated that you were going to follow up with your client and provide supplemental responses, but I have not received any further responses. Please let me know whether your client intends to supplement these requests.

If I do not receive the supplemental documents by Friday, November 22, 2019, I will have no choice but to request another hearing with Judge Eifert related to the first set of discovery.

Eric D. Salyers, Esquire

Re: *Rebecca Klug v. Marshall University Board of Governors and Farid B. Mozaffari*

November 12, 2019

Page 2

Thank you for your kind and prompt attention to this important matter. I look forward to hearing from you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kristina Thomas Whiteaker". The signature is fluid and cursive, with the first name "Kristina" being more prominent.

Kristina Thomas Whiteaker

KTW/arw

c: Rebecca Klug